

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ESTER LORUSSO,

Plaintiff,

-against-

ALITALIA-LINEE AEREE ITALIANE SpA,

Defendant.

Case Number: 07 CV 3583 (LBS) (RLE)

DECLARATION OF ROBERT OTTINGER

Robert W. Ottinger hereby declares under penalty of perjury pursuant to 28

U.S.C. §1746 as follows:

I am the partner of The Ottinger Firm, P.C., attorneys for plaintiff Ester Lorusso (“Lorusso”) in the above-captioned action. This affidavit is based on my personal knowledge and is submitted in opposition to the Defendant’s Motion for Summary Judgment. True and correct copies of the following documents are annexed hereto:

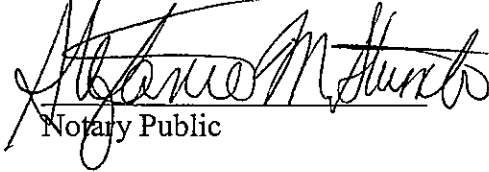
<u>Exhibit</u>	<u>Description</u>
A	Complaint, dated April 6, 2007 (“Complaint”).
B	Answer, dated May 22, 2007 (“Answer”).
C	Relevant Portions of the Transcript of the Deposition of Ester Lorusso, dated December 19, 2007 (“Lorusso Depo.”)
D	Relevant Portions of the Transcript of the Deposition of Francesco Gallo, dated January 7, 2008, January 11, 2008 and March 13, 2008

	("Gallo Depo.").
E	Relevant Portions of the Transcript of the Deposition of Giulio Libutti, dated January 21, 2008 ("Libutti Depo.")
F	Relevant Portions of the Transcript of the Deposition of Pierandrea Galli, dated January 28, 2008 ("Galli Depo.")
G	Relevant Portions of the Transcript of the Deposition of Andrea Sciarresi, dated April 18, 2008 ("Sciarresi Depo.")
H	Affidavit of Gabriele M. Mariotti, dated May 28, 2008("Mariotti Aff.")
I	1997 Travel Agent Magazine article in which Ester Lorusso was named to its "Most Powerful Women in Travel" list.
J	E-mail from Ester Lorusso to Giulio Libutti and Francesco Gallo, dated September 16, 2004 (Bates No. D0211)
K	E-mail from Ester Lorusso Giulio Libutti and Francesco Gallo, dated September 20, 2004 (Bates No. D0209)
L	E-mail from Ester Lorusso to Andrea Sciarresi, dated August 24, 2004 (Bates Nos. D0215-216)
M	Defendant's Rule 56.1 Statement, dated April 28, 2008
N	E-mail from Ester Lorusso to Andrea Sciarresi, dated September 1, 2004 (Bates No. D0212)
O	E-mail chain including an e-mail from Andrea Porru to Walter Longo, copying Luca Bruni, dated November 7, 2006 and an e-mail from Walter Longo to Andrea Porru, copying Luca Bruni, dated November 10, 2006 (Bates Nos. D0028-D0031)
P	Memorandum to G. Cimoli, signed by Pierandrea Galli and Leopoldo Conforti, dated September 19, 2005 and a certified translation of same (Bates Nos. D0695-700)
Q	Email from Ester Lorusso to Andrea Sciarresi, dated September 1, 2004 (Bates No. D0212)
R	Email from Ester Lorusso to Giulio Libutti and Francesco Gallo, dated September 20, 2004 (Bates No. D0209)
S	Memorandum to the file from Stephanie Di Clemente, dated September 2, 2004 (Bates Nos. D0001-0004)
T	E-mail chain composed of an e-mail from Ester Lorusso to alter Longo, copying Andrea Porru, dated September 27, 2006 and an e-mail from Andrea Porru to Ester Lorusso, copying Walter Longo, dated October 11, 1006 (Bates Nos. D0012-0014)
U	E-mail chain including an e-mail from Andrea Porru to Walter Longo, copying Luca Bruni, dated October 30, 2006 and an email from Walter Longo to Andrea Porru, copying Luca Bruni, dated November 9, 2006 (Bates Nos. D0022-0027)
V	Letter from Andrea Porru to Ester Lorusso, dated January 18, 2007 (Bates No. D0034)
W	E-mail chain composed of an e-mail from Ester Lorusso from Andrea Porru, copying Walter Longo and Thierry Aucoc, dated November 6,

	2006 and an e-mail from Andrea Porru to Ester Lorusso, copying Walter Longo and Thierry Aucoc, dated November 7, 2006 (Bates Nos. D0015-0016)
X	Affidavit of Ester Lorusso, dated May 29, 2008


Robert W. Ottinger

Sworn to before me this
30th day of May, 2008


Notary Public

Stefanie M. Stumbo
Notary Public, State of New York
01ST6103964
Qualified in Kings County
Commission Expires January 12, 2012